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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**SEVENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE
PERIOD OF APRIL 1, 2020 THROUGH AND INCLUDING APRIL 30, 2020**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	April 1, 2020 – April 30, 2020
Total Amount of Fees Incurred:	\$58,264.00
Total Fees Requested (80%):	\$46,611.20
Total Reimbursement of Expenses Incurred:	\$21.00
Total Reimbursement of Expenses Requested (100%):	\$21.00
Total compensation and Reimbursement Requested in this Statement:	\$46,632.20
This is Applicant's:	Seventh Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Seventh Monthly Fee Statement (the "Fee Statement") for the period of April 1, 2020 through and including April 30, 2020 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$58,264.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$46,611.20.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,123.45². The Blended hourly rate of all paraprofessionals is \$305.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$21.00 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests

² The blended hourly billing rate of \$1,123.45 is derived by dividing the total fees for attorneys of \$57,745.50 by the total hours of 51.4.

³ The Blended hourly billing rate of \$305.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$518.50 by the total hours of 1.7.

(i) compensation in the amount of \$46,611.20 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$58,264.00) and (ii) payment of \$21.00 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: June 10, 2020
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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*Co-Counsel to the Ad Hoc Committee of
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Litigation Claimants*

EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU01	Asset Analysis and Recovery	6.0	\$6,262.50
PU03	Business Operations	4.4	\$5,507.00
PU04	Case Administration	15.1	17,425.00
PU06	Employment and Fee Applications	4.2	3,645.50
PU07	Emergency Financing	7.8	9,420.00
PU09	Meetings and Communications w/ AHC	9.7	11,360.50
PU11	Plan and Disclosure Statement	5.9	\$4,643.50
	TOTALS:	53.1	\$58,264.00

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	33.7	\$44,315.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	13.9	\$11,815.00
Michael A. Pantzer ("MAP") Associate	2017	\$425.00	3.8	\$1,615.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	1.7	\$518.50
	TOTAL		53.1	\$58,264.00

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

May 22, 2020
BILL NO. 210271

For Services Rendered Through April 30, 2020:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/20 JSF	Telephone Call(s) Report from Debtors re: Special Committee Work and Review	1.20	1,020.00
04/13/20 JSF	Telephone Call(s) Conference Call with ACH Professionals re: Sacklers	.50	425.00
04/13/20 MLC	Conference call(s) Conference call with AHC counsel re certain Sackler transactions	.40	526.00
04/23/20 MLC	Correspondence Review of correspondence between UCC, NCSG and Sackler Families with Court concerning discovery disputes	.80	1,052.00
04/28/20 MLC	Analysis of Memorandum Review of insurance analysis prepared by Gilbert firm	1.30	1,709.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/20 JSF	Examine Documents Updates on Sackler Due Diligence and Rule 2004	.50	425.00
04/29/20 JSF	Examine Documents Statement of AHC in Support of Rule 2004 Motion of NCSG of Sacklers	.20	170.00
04/30/20 JSF	Examine Documents Pleadings re: Rule 2004 Discovery Request of Sacklers and Status of Discovery	1.10	935.00
TOTAL PHASE PU01		6.00	\$6,262.50

Phase: PU03	BUSINESS OPERATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/20 MLC	Conference call(s) Due diligence zoom meeting with FTI/HL re Naloxone/HRT motion	.70	920.50
04/08/20 MLC	Analysis of Memorandum Review of FTI/HL presentation analysis of HRT funding proposal by Debtors	1.00	1,315.00
04/12/20 MLC	Correspondence Correspondence with UCC and NCSG counsel re HRT financing motion	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/20 MLC	Correspondence Correspondence with UCC and NCSG counsel re HRT motion adjournment and related issues	.40	526.00
04/28/20 JSF	Examine Documents HRT Nalaxone Agreement and Status	.60	510.00
04/28/20 MLC	Analysis of Memorandum Review of Debtors' motion re funding agreement with Harm Reduction Therapeutics	1.30	1,709.50
TOTAL PHASE PU03		4.40	\$5,507.00

Phase: PU04

CASE ADMINISTRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/20 JSF	Telephone Call(s) Conference Call with Monitor re: Status	.60	510.00
04/03/20 MLC	Conference call(s) Conference call with States and Secretary Vilasck	.60	789.00
04/03/20 MLC	Analysis of Memorandum Review of UCC application to change efficiency counsel	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/20 JKH	Diary & Docket Calendar subcommittee call	.10	30.50
04/09/20 MLC	Analysis of Memorandum Review of joinder filed by Illinois school district	.40	526.00
04/12/20 MLC	Analysis of Memorandum Review of analysis prepared by KL concerning NCSG and UCC views on HRT financing motion	.90	1,183.50
04/13/20 JSF	Examine Documents Update on Efforts of Other Parties to Join Mediation as Mediation Party	.20	170.00
04/14/20 MLC	Analysis of Memorandum Review of outline of issues re motion Illinois school districts (Aurora) re being designated as Mediation Party	.90	1,183.50
04/18/20 MLC	Correspondence Correspondence with Paul Singer and Jennifer Peacock concerning pending motion by Thorton public schools re mediation process	.60	789.00
04/18/20 MLC	Analysis of Memorandum Review of motion filed by White & Case on behalf of Ad hoc of various creditors	1.10	1,446.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/20 MLC	Telephone Call(s) Telcon with Ken Eckstein re next steps	.90	1,183.50
04/19/20 MLC	Correspondence Correspondence between UCC, NCSG and CSG concerning Ad Hoc statement (White & Case) and resolution re Thorton Public Schools	.70	920.50
04/20/20 MLC	Conference call(s) Conference call with AHC and DOJ concerning process and current status of various motions	.80	1,052.00
04/20/20 JKH	Correspondence Email exchanges re: set up of telephonic omnibus hearing	.20	61.00
04/21/20 JKH	Prepare for Court Appearance Re: telephonic appearance	.40	122.00
04/22/20 JSF	Telephone Call(s) Participate Telephonically in Court Hearing	1.80	1,530.00
04/22/20 MLC	Court Appearance - General Court appearance in connection with first interim fee hearing and other matters	1.80	2,367.00
04/22/20 MLC	Analysis of Memorandum Review of composition of MSG/Rule 2019 filing	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/20 MAP	Review Documents Per request from MLC, Retrive 2019 statement for multi-state group, research Schumacher Group	.30	127.50
04/23/20 MLC	Telephone Call(s) Telcon with Ken Eckstein and Aaron Cahn (W VA counsel) re status of case and plan issues	.40	526.00
04/24/20 MLC	Telephone Call(s) Follow up telcon with Ken Eckstein concerning coordination of committee efforts	.30	394.50
04/26/20 MLC	Conference call(s) Conference call with Ken Eckstein and R Ringer re general status of case	1.00	1,315.00
04/28/20 JKH	Diary & Docket Review Notice of Omnibus Hearings and calendaring all hearing dates	.20	61.00
04/30/20 JSF	Correspondence Colleen MacDonald (Purdue) re: Payments on Monthly Fee Statement	.10	85.00
TOTAL PHASE PU04		15.10	\$17,425.00

Phase: PU06

EMPLOYMENT & FEE APPLICATIONS

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/20 JKH	Prepare Legal Papers Finalizing monthly statement for February for filing	.20	61.00
04/10/20 JSF	Correspondence E-Mail to Chambers with Fee Application	.30	255.00
04/20/20 JSF	Examine Documents Prepare for Fee Application Hearing - Review of Fee Application	.30	255.00
04/20/20 JSF	Correspondence Purdue re: Payment of January Monthly Statement	.20	170.00
04/20/20 JKH	Diary & Docket Prepare monthly statement for filing and calendar objection deadline	.10	30.50
04/21/20 JSF	Telephone Call(s) AHC Professionals Call to Prepare for Fee Hearing	.20	170.00
04/21/20 JSF	Examine Documents Proposed Order Approving Fees	.20	170.00
04/21/20 MLC	Conference call(s) Meeting with co-counsel to prepare for interim fee application hearing	.20	263.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/20 MLC	Analysis of Memorandum Review of Allergan Lift Stay Motion summaries	.60	789.00
04/23/20 MLC	Draft/revise Review of proposed Order granting first interim fee application	.30	394.50
04/28/20 JSF	Examine Documents Sixth Monthly Fee Application	1.10	935.00
04/28/20 JKH	Prepare Legal Papers Prepare draft sixth monthly statement	.20	61.00
04/28/20 JKH	Draft/revise Edit sixth monthly statement and exhibit charts	.30	91.50
TOTAL PHASE PU06		4.20	\$3,645.50

Phase: PU07

EMERGENCY FINANCING

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/20 MLC	Analysis of Memorandum Review of memorandum by KL describing telcons with UCC and Debtors' counsel re ERF proposal	.60	789.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/20 MLC	Conference call(s) Follow up conference call with counsel concerning next steps for ERF	.60	789.00
04/08/20 JSF	Examine Documents Debtors' Revisions to ERF	.40	340.00
04/08/20 JSF	Examine Documents UCC Comments to ERF Draft	.20	170.00
04/08/20 MLC	Analysis of Memorandum Review and analysis of debtors' draft ERF plan	1.30	1,709.50
04/08/20 MLC	Correspondence Correspondence with AHC subcommittee on ERF and counsel re Debtors' draft ERF	.80	1,052.00
04/09/20 JSF	Telephone Call(s) Conference Call with AHC re: ERF	.60	510.00
04/09/20 JSF	Examine Documents Draft Letters to Debtors re: ERF Proposal	.30	255.00
04/09/20 MLC	Analysis of Memorandum Review and analysis of ERF mark-up by debtors	1.20	1,578.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/20 MLC	Conference call(s) Conference call with States only on AHC re ERF proposal by debtors and related issues	.60	789.00
04/09/20 MLC	Telephone Call(s) Telcon with Rachael Ringer re comments to draft letters re ERF	.30	394.50
04/10/20 JSF	Examine Documents Update on Status of ERF	.10	85.00
04/10/20 MLC	Conference call(s) Conference call with DOJ, AHC counsel and certain AHC members concerning Debtors' redraft of the ERF and next steps	.60	789.00
04/15/20 JSF	Examine Documents Proposed Letter to Debtors re: ERF	.20	170.00
TOTAL PHASE PU07		7.80	\$9,420.00

Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/20 JSF	Telephone Call(s) Weekly Update Conference Call with AHC	1.20	1,020.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/20 MLC	Conference call(s) Conference call with AHC committee and counsel - regular weekly meeting	1.10	1,446.50
04/01/20 MLC	Correspondence Correspondence among AHC counsel re next steps	.30	394.50
04/06/20 MLC	Conference call(s) Conference call with Special Committee of Consenting States	1.30	1,709.50
04/07/20 JSF	Examine Documents Update Report to Committee	.20	170.00
04/13/20 JSF	Telephone Call(s) AHC Committee Update Conference Call	.70	595.00
04/15/20 MLC	Conference call(s) Weekly meeting of AHC	.80	1,052.00
04/24/20 MLC	Conference call(s) Call with States and localities on AHC to discuss status of various plan discussions and next steps	.60	789.00
04/24/20 MLC	Conference call(s) Conference call among counsel to the AHC	.80	1,052.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/28/20 MLC	Conference call(s) Conference call with Paul Singer, Ken Eckstein and Rachael Ringer re chapter 11 next steps	1.10	1,446.50
04/29/20 JSF	Telephone Call(s) AHC Weekly Status Call	.70	595.00
04/29/20 JSF	Examine Documents Agenda Items for AHC Meeting	.20	170.00
04/29/20 MLC	Conference call(s) Committee meeting for AHC	.70	920.50
TOTAL PHASE PU09		9.70	\$11,360.50

Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/20 MLC	Analysis of Memorandum Review of analysis re Plan Structure/Legal Issues	1.40	1,841.00
04/14/20 MAP	Research Research Plan Structure/Legal Issues to prepare memo for MLC	2.10	892.50

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NEW YORK, NY 10169-0075

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/20 MAP	Draft/revise Draft Memo on Plan Structure/Legal Issues for MLC	1.40	595.00
04/22/20 MLC	Correspondence Correspondence with Don Simon concerning Tribes and plan prospective structure	.80	1,052.00
04/23/20 MLC	Correspondence Correspondence concerning follow up re call with hospitals counsel	.20	263.00
TOTAL PHASE PU11		5.90	\$4,643.50
		TOTAL FOR SERVICES	\$58,264.00

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Electronic Research	\$21.00
TOTAL:	\$21.00

EXHIBIT E

Expense Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

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DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research	21.00
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TOTAL DISBURSEMENTS	<hr/> 21.00
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